

**The following dot points are a response to the Productivity Commission Inquiry, from a collective group of Family Day Care Services in Tasmania.**

- The report recommends that all educators working with children under 3 are only required to hold a certificate 111 (Draft Report 7.2). Evidence based research already informs us that the higher the qualification the better outcomes for children. The commission proposes that warm nurturing relationships are enough. Any decision must be guided by evidence based research; every child has the right to a strong foundation to support lifelong learning.
- The report also recommends that the number of children under 3 no longer has to be taken into account when assessing the employment of an ECT in the service. Again this decision disregards the fundamental rights of the child and the importance of quality early learning in the formative years.
- The Draft report recommends deemed cost of care to cover the operational cost only- some families will be paying a gap fee which could impact on families' access to accessing care, "*Accessibility and affordability*". This would have an impact on the most vulnerable children not being able to access quality child care. Some children to no fault of their own are better off in a care environment due to some family' circumstances.
- Deemed cost – historically in health and disability services 'deemed costs' or 'unit pricing' are really reflective of the actual cost of delivery of a service. The burden any gap fee will add to the budget of those on government benefits or a low income will mean childcare becomes unaffordable for many families.
- Lack of childcare will often mean lack of monitoring by mandated reporting and lack of identification of possible developmental delays. Don't further marginalise already vulnerable families whose children are developmentally vulnerable.
- We agree that Nannies need to operate under the NQF and meeting qualifications. The report mentioned that they would be randomly chosen to go through R&A. A better solution to this monitoring would be a similar system to Family Day Care and operate under a scheme system. This would support the monitoring and accountability to ensure that all children have access to a NQ standard of care. Otherwise how will the Regulatory Authority in each state and territory be able to monitor and undertake Rating & Assessment visits considering the work load of some units who already don't meet time lines?
- Grandparents also should also be required to meet the Mandatory requirements to access support Money to take care of grandchildren.
- At the moment families can access 24 hours of care if not working under the recommendations in this report this will change. Vulnerable children could miss out on the valuable learning opportunities if the criterion is altered to 24 hours per fortnight. What happens to all those families that contribute to community canteen duty, parent help, volunteering etc...? What impact does this have on the economy and the community?
- Removal of Pay Roll Tax Exemption for Not for Profit providers- (D R 10.1). This has significant implications for the viability for not for profit provides of education and care. The removal of pay role tax exemption would be an additional cost to the not for profit service whose total wages (inc superannuation) exceed the threshold level. This will ultimately drive up the cost for families accessing care.
- The Draft Report recommends allowing services to temporarily operate with staffing levels below the required ratio- by maintaining staffing levels on average (over a day

or week) rather than at all times (D R 7.5). This could leave the service and children in a vulnerable position in regards to Health, Safety including the well being and duty of care of children.

- Simplifying the National Standard (D R 7.1). Simplifying or removing standards and elements of the NQS that can be removed (whilst not altering quality outcomes for children). All standards and elements are important and to remove would dampen down the intent on meeting outcomes for children.
- The simplification of the NQS etc...to not have an overall rating but just separate ratings for each Quality Area...having just one 'working towards' impacts so much on the final result that the 'real' overall quality may not actually be reflected in the end result
- Viability Assistance should not be prioritised to centre-based and mobile services. Family Day Care and In Home Care deserve this opportunity too.
- Families on higher incomes (e.g. \$250,000 plus pa) should not be eligible for ECLS but should cover the cost of their children's care.
- Is the way most centres are funded and charge families (i.e. for large blocks of time when they may only use part of that time) a fair and equitable system? Should parents receive CCB for a service they would not reasonably want (e.g. a full session time) if there was an alternative?
- 24 hr work/study test – should childcare be provided on the basis of only parental need, not on what may be of great benefit for the child's development?
- There are also positives in the report- which need to be acknowledged but changes to ratio and staffing qualifications cannot be ignored.
- Closing statement. The current National Quality System has been something that the sector has fought for years as we have advocated for better outcomes for children. By watering down ratios and qualification and removing the education component out of education and care we are moving backwards as a Nation and denying the future of Australian Children the best start in life.

Thank you for considering the dot points on behalf of Family Day Care co-ordinators.

3/9/2014